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[Additional Counsel not listed]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, et  
al..

Case No. 3:25-cv-03698-SI

**SUPPLEMENTAL DECLARATION OF  
SARAH HUNTER**

### **Plaintiffs,**

V.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al..

### Defendants.

## **DECLARATION OF SARAH HUNTER**

I, Sarah Hunter, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am steward of the American Federation of Government Employees Local 1534 (“Local 1534” or “Union”), which represents a bargaining unit of employees at the United States Department of State, and offer this declaration in that capacity. I previously provided a declaration in this case in support of Plaintiffs’ TRO application (Dkt. 37-20).

9       3. On March 30, 2025, the Union’s First Vice President emailed Steven J. Polson,  
10 Chief Labor Management Negotiator of the State Department, to request guidance following an  
11 OPM memo on implementation of President Trump’s Executive Order titled “Exclusions from  
12 Federal Labor-Management Relations Programs.” On Monday, March 31, 2025, I was copied on  
13 Mr. Polson’s response to Local 1534, in which Mr. Polson stated that “all collective bargaining  
14 agreements (CBA) between AFGE Local 1534 and the Department are considered null and void,”  
15 and “[w]e will not engage AFGE Local 1534 in any scheduled meetings or any ongoing  
16 negotiations.” A true and correct copy of that email correspondence is attached hereto as Exhibit  
17 A.

I declare under penalty of perjury under the laws of the United States that the foregoing is  
true and correct. Executed May 13, 2025, in Washington, D.C.

  
Sarah Hunter

# Exhibit A



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**RE: Request for Guidance Following OPM Memo on Labor Management Exclusions**

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From Polson, Steven J <[REDACTED]>

Date Mon 3/31/2025 1:58 PM

To Celeste Nelson <[REDACTED]>; Klemm, Christopher G <[REDACTED]>; Phillips, Bradley Aaron <[REDACTED]>

Cc Nicholas Davis <[REDACTED]>; Sylvia B Joyner <[REDACTED]>; Hunter, Sarah <[REDACTED]>

The Department of State will move forward to implement the below linked Executive Order “Exclusions from Federal Labor-Management Relations Programs.” In so doing, all collective bargaining agreements (CBA) between AFGE Local 1534 and the Department are considered null and void. Any official time granted through those CBAs (professional bargaining unit, non-professional bargaining unit, and CGFS Charleston professional and non-professional bargaining unit) is hereby rescinded and you should be reporting back to your direct hire position of record in the next business day. Your Bureau EX and others will be notified of this action. You must also remove all material and vacate the AFGE Local 1534 Department provided Office Suite. GTM/EX will take action to cut off all those who currently have access to this suite by the end of this business week.

We will not engage AFGE Local 1534 in any scheduled meetings or any ongoing negotiations. All active grievances, arbitrations and/or Unfair Labor Practices are hereby cancelled.

We will also inform CGFS to cease any and all payroll allotments of bargaining unit member dues paid to AFGE Local 1534.

Should any judicial action put a temporary restraining order on this Executive Order, we will need to reconsider our position taking into consideration any guidance provided by the current administration.

<https://www.whitehouse.gov/presidential-actions/2025/03/exclusions-from-federal-labor-management-relations-programs/>

Steven J. Polson  
Chief Labor Management Negotiator  
Policy, Planning and Communication Staff  
Labor Management (GTM/PPC/LM)  
Room 1239, HST  
Department of State  
[REDACTED]

SENSITIVE BUT UNCLASSIFIED

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**From:** Celeste Nelson <[REDACTED]>  
**Sent:** Sunday, March 30, 2025 6:44 PM  
**To:** Polson, Steven J <[REDACTED]>; Klemm, Christopher G <[REDACTED]>; Phillips, Bradley Aaron <[REDACTED]>  
**Cc:** Nicholas Davis <[REDACTED]>; Sylvia B Joyner <[REDACTED]>  
**Subject:** Request for Guidance Following OPM Memo on Labor Management Exclusions

Hello Steve,

I hope you had a good weekend and this message finds you well.

I am writing in reference to the March 27, 2025, OPM guidance memo addressing the implementation of President Trump's Executive Order titled Exclusions from Federal Labor-Management Relations Programs. As outlined in the memo, the Department of State is among the agencies no longer subject to the provisions of the Federal Service Labor-Management Relations Statute (FSLMRS).

Given the significant implications of this directive — including the agency's release from the obligation to recognize or negotiate with federal unions I would like to request guidance on the way forward for AFGE Local 1534 and its union operations, including the disposition of union-related property, access, and space.

I also want to take a moment to sincerely thank you Steve, and your team for your collaboration and professionalism in working with AFGE 1534 prior to this order. Your engagement has been greatly appreciated, and we've accomplished a lot together on behalf of employees.

For awareness, I have already informed my supervisor, Yolanda Atkins, of the OPM memo and its implications.

I do have a few questions as we prepare for this transition:

1. When is the Department expected to formally implement the changes outlined in the OPM memo?
2. Will there be a formal notification or communication issued to the unions or bargaining unit employees?
3. What will be the process for handling union-related office space, records, and agency-facilitated resources such as dues allotment and union time?
4. Will we receive a response for the Grievances that are processing?

Also, I want to point out that I am currently working under an approved reasonable accommodation, which is in place through November 2025 (and likely to be renewed). I am (as well as the stewards of course), prepared to follow all instructions related to returning to my previous duties or any realignment that may occur as a result of this directive.

Please advise on next steps, or if there will be a formal meeting scheduled to address these matters. I appreciate your time and guidance as we all work to ensure compliance while supporting impacted employees.

Of course this is an unfortunate time for all. I look forward to your response.

Celeste Nelson  
1st V.P DoS  
AFGE 1534

*The information I provide is based on my understanding of the collective bargaining agreement, past practices, and relevant labor laws. For specific legal advice or representation, I strongly encourage you to consult with a qualified attorney. Nothing I say should be construed as legal advice. This information is for general guidance only and does not create an attorney-client relationship.*

Got a question: [REDACTED]

*\*If you are an AFGE BUE employee or member, responding to this email indicates your approval for the Union to assist you. If you do not approve, please confirm by replying to this email with a written statement indicating otherwise.*